

**THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

JAMIE LEE ANDREWS, as	*
Surviving Spouse of	*
MICAH LEE ANDREWS, Deceased,	* CIVIL ACTION FILE
and JAMIE LEE ANDREWS, as	*
Administrator of the Estate of	* NO.1:14-CV-03432-WSD
MICAH LEE ANDREWS, Deceased	*
Plaintiff,	*
v.	*
MAZDA MOTOR CORPORATION,	*
MAZDA MOTOR OF AMERICA, INC.,	*
AUTOLIV, INC., AUTOLIV ASP, INC.,	*
AUTOLIV AB, AUTOLIV JAPAN, LTD.,	*
AUTOLIV SAFETY TECHNOLOGY, INC.,	*
ROBERT BOSCH GmbH, ROBERT	*
BOSCH LLC, ROBERT BOSCH NORTH	*
AMERICA CORPORATION, BOSCH	*
CORPORATION, and JOHN DOES 1-5.	*
Defendants.	*

**CONSENT MOTION BY PLAINTIFF AND AUTOLIV
AND [PROPOSED] ORDER FOR
VOLUNTARY DISMISSAL WITHOUT PREJUDICE OF AUTOLIV, INC.,
AUTOLIV ASP, INC., AUTOLIV AB,
& AUTOLIV SAFETY TECHNOLOGY, INC.**

Plaintiff Jamie Lee Andrews (“Plaintiff”) and Defendants Autoliv, Inc., Autoliv ASP, Inc., Autoliv AB, Autoliv Japan, Ltd., and Autoliv Safety Technology, Inc. (“Autoliv Defendants”) show the Court as follows:

WHEREAS in her Second Amended Complaint, Plaintiff asserts strict liability, negligence and punitive damages claims against the Autoliv Defendants;

WHEREAS Autoliv represents that if in fact any Autoliv entity was involved in the design, testing, manufacture, or supply of components of the occupant restraint system in the Mazda 3 at issue in this case, it was Autoliv Japan, Ltd.;

WHEREAS based on this representation Plaintiff wishes to dismiss these claims against Defendants Autoliv, Inc., Autoliv ASP, Inc., Autoliv AB, and Autoliv Safety Technology, Inc.;

WHEREAS Plaintiff and the Autoliv Defendants agree that this action will remain pending against Autoliv Japan, Ltd.;

WHEREAS Plaintiff and the Autoliv Defendants agree that Autoliv Japan, Ltd. will respond to discovery, including document requests, with information and documents in the possession, custody, or control of Autoliv Japan Ltd. or any of the other Autoliv entities, and in accordance with the rules of this Court;

WHEREAS Plaintiff and the Autoliv Defendants agree that the statutes of limitation and repose for claims against Autoliv, Inc., Autoliv ASP, Inc., Autoliv AB, and Autoliv Safety Technology, Inc. are tolled beginning from the date that

Plaintiff initiated this action on September 18, 2014, and will remain tolled until the claims against Autoliv Japan, Ltd. are resolved;

THEREFORE, Plaintiff and the Autoliv Defendants, by undersigned counsel, move the Court to enter the proposed Order containing the following terms:

1. Dismissal of plaintiff's claims without prejudice against Autoliv, Inc., Autoliv ASP, Inc., Autoliv AB, and Autoliv Safety Technology, Inc.
2. The statutes of limitation and repose for claims against Autoliv, Inc., Autoliv ASP, Inc., Autoliv AB, and Autoliv Safety Technology, Inc. will be tolled beginning from the date that Plaintiff initiated this action on September 18, 2014, and will remain tolled until the claims against Autoliv Japan, Ltd. are resolved.
3. The rights and claims of Plaintiff against any other Defendant in the above-captioned case will not be affected by the Court's Order.

[signatures continued on next page]

Respectfully submitted this 5th day of May, 2015.

BUTLER WOOTEN CHEELEY &
PEAK LLP

BY: s/ Tedra C. Hobson
JAMES E. BUTLER, JR.
jim@butlerwooten.com
Georgia Bar No. 099625
ROBERT D. CHEELEY
bob@butlerwooten.com
Georgia Bar No. 122727
TEDRA C. HOBSON
tedra@butlerwooten.com
Georgia Bar No. 881085
2719 Buford Highway
Atlanta, Georgia 30324
(404) 321-1700
(404) 32101713 Fax

ALSTON & BIRD LLP

By: /s Jenny A. Mendelsohn
Douglas G. Scribner
Georgia Bar No. 632755
Jenny A. Mendelsohn
Georgia Bar No. 447183
One Atlantic Center
1201 West Peachtree Street
Atlanta, GA 30309-3424
404-881-7000
Fax: 404-881-7777

*ATTORNEYS FOR AUTOLIV
DEFENDANTS*

BALLARD & FEAGLE, LLP

By: /s Gregory R. Feagle
WILLIAM L. BALLARD
bill@ballardandfeagle.com
Georgia Bar No. 035625
GREGORY R. FEAGLE
greg@ballardandfeagle.com
Georgia Bar No. 256913
1180 West Peachtree St., Suite 2250
Atlanta, Georgia 30309
(404) 873-1220

ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF COMPLIANCE

Pursuant to Local Rules 5.1(B) and 7.1(D), I hereby certify that the foregoing filing complies with the applicable font and size requirements and is formatted in Times New Roman, 14 point font.

s/ Tedra C. Hobson

JAMES E. BUTLER, JR.

Georgia Bar No. 099625

ROBERT D. CHEELEY

Georgia Bar No. 122727

TEDRA C. HOBSON

Georgia Bar No. 881085

Butler Wooten Cheeley & Peak LLP

2719 Buford Highway

Atlanta, Georgia 30324

(404) 321-1700

(404) 321-1713 Fax

CERTIFICATE OF SERVICE

This is to certify that on May 5, 2015, I electronically filed CONSENT MOTION BY PLAINTIFF AND AUTOLIV AND [PROPOSED] ORDER FOR VOLUNTARY DISMISSAL WITHOUT PREJUDICE OF AUTOLIV, INC., AUTOLIV ASP, INC., AUTOLIV AB, & AUTOLIV SAFETY TECHNOLOGY, INC. with the Clerk of the Court using the CM/ECF system which will automatically send email notification of such filing to the following attorneys of record:

C. Bradford Marsh, Esq.
Ashley W. Broach, Esq.
Myrece R. Johnson, Esq.
Swift, Currie, McGhee & Hiers, LLP
1355 Peachtree St., N.E., Suite 300
Atlanta, GA 30309

Douglas G. Scribner, Esq.
Jenny A. Mendelsohn, Esq.
Alston & Bird LLP
One Atlantic Center
1201 West Peachtree Street
Atlanta, GA 30309-3424

Michael Sullivan, Esq.
Vonnetta L. Benjamin, Esq.
Womble Carlyle Sandridge
& Rice, LLP
Atlantic Station
271 – 17th Street, N.W., Suite 2400
Atlanta, GA 30363-1017

This 5th day of May, 2015.

BY: s/ Tedra C. Hobson
JAMES E. BUTLER, JR.
Georgia Bar No. 099625
ROBERT D. CHEELEY
Georgia Bar No. 122727
TEDRA C. HOBSON
Georgia Bar No. 881085
Butler Wooten Cheeley & Peak LLP
2719 Buford Highway
Atlanta, Georgia 30324
(404) 321-1700
(404) 321-1713 Fax